



**U.S. Department of Justice**

*United States Attorney  
Eastern District of Missouri*

*Organized Crime Drug Enforcement  
Task Force - West Central Region*

*MICHAEL A. REILLY  
Assistant United States Attorney*

*Thomas F. Eagleton U.S. Courthouse Direct (314) 539-7723  
111 South 10<sup>th</sup> Street, Rm. 20.333 Office: (314) 539-2200  
St. Louis, Missouri 63102 Fax: (314) 539-2312*

March 2, 2021

**VIA EMAIL**

Blaire Dalton  
Attorney at Law  
53 W. Jackson Blvd.  
Suite 1550  
Chicago, IL 60604  
blairec.dalton@gmail.com  
(Attorney for defendant Dillon)

Vadim A. Glozman  
Attorney at Law  
53 W. Jackson Blvd.  
Suite 1410  
Chicago, IL 60604  
vglozman2@gmail.com  
(Attorney for defendant Dillon)

Quinn A. Michaelis  
Attorney at Law  
73 West Monroe  
Suite 106  
Chicago, IL 60603  
qmichaelis@yahoo.com  
(Attorney for defendant Grady)

Josh B. Adams  
Attorney at Law  
53 W. Jackson Blvd.  
Suite 1615  
Chicago, IL 60604  
josh@adamsdefenselaw.com  
(Attorney for Defendant Grady)

Re: **United States v. Velazquez et al.**  
**Case Number S5-4:15 CR 404 HEA**

March 2, 2021

Page 2

Dear Counsel:

This is a request for reciprocal discovery. Pursuant to Rule 16(b)(1)(A), (B) and (C), Federal Rules of Criminal Procedure, the United States hereby requests that:

A. The defendant provide the United States, or permit the United States to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial.

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony.

C. The defendant provide the United States a written summary of the testimony that the defendant intends to use under Rules 702, 703, or 705, Federal Rules of Evidence, as evidence in trial, which includes a description of the witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications.

Further, pursuant to the provisions of Rule 26.2 the Government requests the defendant and his attorney to provide to the Government any statements of defense witnesses that are in their possession and that relate to the subject matter concerning which the witnesses have testified.

Pursuant to Rule 12.1, the Government requests that the defendant notify the government of any intended alibi defense; specifically, that the defendant was not present at the time, date and place of the offenses listed in the indictment.

The Government requests a response on or before March 11, 2021, in order to determine if there is a need to file its request for a court order to enforce compliance.

Very truly yours,

SAYLER A. FLEMING  
United States Attorney

s/ Michael A. Reilly  
MICHAEL A. REILLY, #43908MO  
Assistant United States Attorney

MAR